

Stephani McKee

July 11, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
RE: Business Opportunity Rule, r511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam,

I am writing this letter because I am deeply concerned about the proposed Business Opportunity Rule R511993. I have been an Independent Consultant with Arbonne International for 15 months. Prior to becoming an Independent Consultant with Arbonne I was an Elementary School Teacher in Lincoln, NE. My husband and I have three daughters, and it is important to my family that I am able to be home with them. Building a business with Arbonne has allowed me the ability contribute to my family finances, and be home with my children. I have currently built a business with over 3000 Independent Consultants enjoying Arbonne's products. This business is truly changing people's lives. I believe that the Business Opportunity Rule R511993, in its present form, could make building my Arbonne Business incredibly difficult. I understand the FTC is responsible for protecting the public from "unfair and deceptive acts or practices," but some of the areas of the proposed rule will make it very difficult for me to sell Arbonne products and sponsor people into the business. The proposed rule could actually prevent me from continuing as an Arbonne Independent Consultant. If this were to occur, the financial impact on my family finances would be devastating.

One of my concerns with the proposed rule is the 7-day waiting period. My fear is the fact that a waiting period casts doubt on the industry of direct sales. It gives the impression that something may be wrong with the industry and with Arbonne, in particular. In reality, this industry is affording hundreds of thousands of people, just like myself the ability to work from home. A waiting period of this kind could be devastating to the entire industry. Along with the waiting period, I would be required to keep very detailed documentation of communication with each of my customers, as well as people that are interested in building a business. One of the key elements to my success with this business is capturing the enthusiasm and

immediate results prospects experience with the products. Both the products and the Starter Kit can be purchased for a nominal amount. The waiting period would leave people questioning the products and the industry.

Another concern of mine is the section that refers to litigation reporting. The proposed rule calls for the release of any information regarding lawsuits involving misrepresentation, or unfair deceptive practices. It does not matter if the company was found innocent. My fear is in this litigious society that we live in, we would be asked to disclose information regardless of the outcome. I compare this to a physician needing to disclose all lawsuits regardless of being found innocent. I can imagine the negative impact this would have on his/her business. This would be true for my business, as well. I fear being penalized by the impression a lawsuit would leave.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. My concern is the fact that we would be disclosing personal information about a consultant to virtual strangers. In this era of identity theft, I am extremely uncomfortable sharing this information. I would also find it an invasion of privacy to have to disclose personal data for my business purposes. In addition, we have many consultants that are building their business at a distance making it very difficult to find ten consultants for references that are in the area.

Direct Sales is simply a form of distribution. It is a method to get product from point A to point B. I am simply building a network of people shopping in Arbonne's mall. Imagine the damage that would be caused if this proposed rule was applied to any retail shop. For example, imagine going to the Clinique counter to purchase make-up and being informed that I can purchase make-up but there will be a 7-day waiting period. I am then given information on all litigation, regardless of the outcome. I am then given a list of 10 prior customers and their personal contact information. I am also asked to provide my personal contact information to be used as references. It would be impossible for any retail store to conduct business with these requirements. This rule will have the same negative impact on my business, actually preventing me from being an Independent Consultant with Arbonne.

I truly appreciate that the FTC is responsible for protecting the public. I understand that there are fraudulent groups and value the work of the FTC. However, I feel that the proposed rule unfairly targets legitimate direct

selling businesses. I believe the rule would have detrimental consequences. I sincerely hope there are alternatives to resolving the issues without harming the livelihood of millions of successful network marketers, like myself.

Sincerely,

Stephani McKee